

Comments on the NOP's "Recommended Framework to Further Clarify the Definition of Synthetic"

In section 2.2, there is a proposed definition which reads, "Substance – An element, molecular species, or chemical mixture that processes a distinct identity (e.g., having a separate Chemical Abstract Service (CAS) number, Codex International Numbering System (INS) number, or FDA or other agency standard identity)."

I suggest that the word "processes" should be replaced with the word "possesses." With this change, I strongly support the proposed definition.

Section 3.3 states that "a formulated substance is nonsynthetic if it contains only ... synthetic substances on the National List." This makes no sense. I suggest that this phrase be deleted. You cannot mix synthetic substances together to formulate a nonsynthetic substance, even if the synthetic substances are on the National List.

I strongly support the discussion of "Substance" in section 3.4, as written.

Brief comment on the NOP's "Proposed Decision Tree to Distinguish Synthetic and Non-Synthetic Substances"

The proposed flow chart should be very useful for NOSB members to determine if a substance is synthetic or nonsynthetic. However, I suggest that the box titled, "PROCESSING OR USE, as appropriate," be deleted. It has no context. The flow chart is to be used to assess substances petitioned for addition to or prohibition from the National List. The reference to "processing or use" is confusing and out of context.

Respectfully,

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